

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOUREY NEWELL, individually and on behalf of a class of all persons and entities similarly situated,

Plaintiff,

V.  
LENDVIA LLC,

Defendant.

CIVIL ACTION No. 25-cv-01018-GJP

**DEFENDANT’S MOTION FOR PRO  
HAC VICE ADMISSION OF  
JENNIFFER CABRERA, ESQUIRE**

Defendant LendVia LLC (“LendVia” or “Defendant”), by and through its undersigned counsel, respectfully moves this Court, pursuant to Local Rule 83.5.2 and Section I.D. of the Honorable Gerald J. Pappert’s *Policies and Procedures*, for the admission *pro hac vice* of Jenniffer Cabrera, Esquire, of the law firm Troutman Amin LLP, as counsel in the above-captioned action along with counsel of record, Corey M. Scher, Esquire of Fox Rothschild LLP.

In support of this Motion, the undersigned counsel of record submits herewith an affidavit of Jennifer Cabrerra, Esq., a Proposed Order, and a Certificate of Service and states as follows:

1. The undersigned attorney is admitted to practice before this Court and is in good standing before this Court.
2. The undersigned attorney entered his appearance on March 21, 2025. *See* ECF # 5.
3. Defendant respectfully requests that Jennifer Cabrera, Esq. represent it in this matter given Jennifer Cabrera, Esq.’s expertise under the Telephone Consumer Protection Act (47 U.S.C. § 227) and her prior relationship with Defendant generally.
4. Andrew Roman Perrong, Esq., attorney for Plaintiff Jourey Newell (“Plaintiff”), has consented to admission *pro hac vice* of Jennifer Cabrera, Esq.

*See* Hon. Pappert's Policies and Procedures, § I.D. (1)-(4).

The undersigned counsel further states that Jenniffer Cabrera, Esq. is an attorney in good standing admitted to practice law in the highest court of the State of Florida, the United States Court of Appeals for the Eleventh Circuit, and the United States District Court for Southern District of Florida, Middle District of Florida, Northern District of Florida, and District of Colorado. Jenniffer Cabrera, Esq. is willing and able to comply with all applicable rules, including Pennsylvania Rules of Professional Conduct, the Honorable Gerald J. Pappert's *Policies and Procedures*, and the Local Rules of Civil Procedure for the United States District Court for the Eastern District of Pennsylvania.

WHEREFORE, Defendant LendVia LLC respectfully requests this Honorable Court to enter an Order admitting Jenniffer Cabrera, Esq., *pro hac vice*, to serve as counsel for Defendant in this action along with counsel of record, Corey M. Scher.

Dated: April 23, 2025

Respectfully submitted,

/s/Corey M. Scher

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-and-

Jenniffer Cabrera (*pro hac vice pending*)  
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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
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**AFFIDAVIT OF JENNIFFER  
CABRERA, ESQUIRE**

I, Jenniffer Cabrera, Esquire, respectfully submit the following affidavit in support of the Motion for my *Pro Hac Vice* Admission by Defendant LendVia LLC (“LendVia” or “Defendant”) in the above-referenced proceedings. I hereby state the following:

- i. I am an attorney duly licensed to practice law in the following jurisdictions:
  - a. State of Florida since February 2, 2022.
  - b. United States District Court for the Southern District of Florida since November 17, 2022.
  - c. United States District Court for the Middle District of Florida since January 25, 2023.
  - d. United States District Court for the Northern District of Florida since April 26, 2023.
  - e. United States Court of Appeals for the Eleventh Circuit since September 30, 2024.
  - f. United States District Court for the District of Colorado since January 16, 2025.
- ii. I am active and in good standing with my attorney admission for each jurisdiction set forth above.



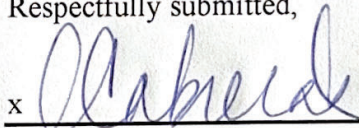
- iii. I have never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which I have been a member;
- iv. I have read Judge Pappert's Policies and Procedures and agree to adhere to them in all respects;
- v. I (a) have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and (b) agree to be bound by both sets of Rules for the duration of the above-captioned matter.
- vi. If granted *pro hac vice* status, I will in good faith continue to advise Corey M. Scher, Esq. of Fox Rothschild LLP, who has moved for the *pro hac vice* admission, of the current status of the above-captioned case and of all material developments therein.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 23, 2025

Respectfully submitted,

x

  
Jenniffer Cabrera (*pro hac vice pending*)  
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-and-

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*Attorneys for Defendant*

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## ORDER

# ORDER GRANTING *PRO HAC VICE* APPLICATION OF JENNIFFER CABRERA

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2025, upon consideration of Defendant's Motion for the *Pro Hac Vice* Admission of Jennifer Cabrera, Esquire, and any response thereto, it is hereby ordered that the motion is GRANTED pursuant to Local Rule of Civil Procedure 83.5.2., and Jennifer Cabrera, Esq. is admitted *pro hac vice* in these proceedings.

BY THE COURT:

GERALD J. PAPPERT, U.S.D.J.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing *Motion for Admission Pro Hac Vice Application of Jennifer Cabrera, Esq.* was served this day upon the following counsel of record via ECF and email:

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*Attorney for Plaintiff and the Proposed Class*

Respectfully submitted,

Dated: April 23, 2025

/s/Corey M. Scher

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-and-

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*Attorney for Defendant*